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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**GOOGLE LLC'S ADMINISTRATIVE
MOTION TO SEAL GOOGLE LLC'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR AN AWARD OF
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Judge: Hon. Yvonne Gonzalez Rogers

Case No. 4:20-cv-03664-YGR-SVK

GOOGLE'S ADMIN. MOT. TO SEAL GOOGLE'S OPP. TO PLAINTIFFS' MOT. FOR AN AWARD OF
ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS

Pursuant to Civil Local Rules 7-11 and 79-5, Judge Yvonne Gonzalez Rogers' Standing Order in Civil Cases (the "Standing Order"), and the Stipulated Protective Order entered in this matter (Dkt. 81), Defendant Google LLC ("Google") respectfully seeks to seal certain portions of Google's Opposition to Plaintiffs' Motion for an Award of Attorneys' Fees, Costs, and Service Awards (filed in unredacted form at Dkt. 1112-1), which contains non-public, highly sensitive and confidential business information that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed. This information is highly confidential and should be protected. Further reasons for sealing will be addressed in a forthcoming omnibus motion.

This administrative motion pertains to:

Dkt. No.	Document or Portion of Document Sought to Be Sealed	Sealed / Redacted / Not Under Seal / Submitted In Camera	Party Claiming Confidentiality
1112-1	Google LLC's Opposition to Plaintiffs' Motion for an Award of Attorneys' Fees, Costs, and Service Awards	Redacted	Google
1112-2	Declaration of Stephen A. Broome In Support of Google LLC's Opposition to Plaintiffs' Motion for an Award of Attorneys' Fees, Costs, and Service Awards	Not Under Seal	N/A
1112-3	Exhibit 1 to Broome Declaration	Not Under Seal	N/A
1112-4	Exhibit 2 to Broome Declaration	Not Under Seal	N/A
1112-5	Exhibit 3 to Broome Declaration	Submitted In Camera	N/A
1112-6	Exhibit 4 to Broome Declaration	Redacted	Google
1112-7	Exhibit 5 to Broome Declaration	Not Under Seal	N/A
1112-8	Exhibit 6 to Broome Declaration	Redacted	Google
1112-9	Exhibit 7 to Broome Declaration	Not Under Seal	N/A
1112-10	Exhibit 8 to Broome Declaration	Not Under Seal	N/A
1112-11	Exhibit 9 to Broome Declaration	Redacted	Google
1112-12	Exhibit 10 to Broome Declaration	Not Under Seal	N/A
1112-13	Exhibit 11 to Broome Declaration	Not Under Seal	N/A
1112-14	Exhibit 12 to Broome Declaration	Not Under Seal	N/A

Dkt. No.	Document or Portion of Document Sought to Be Sealed	Sealed / Redacted / Not Under Seal / Submitted In Camera	Party Claiming Confidentiality
1112-15	Exhibit 13 to Broome Declaration	Redacted	Google
1112-16	Exhibit 14 to Broome Declaration	Redacted	Google
1112-17	Exhibit 15 to Broome Declaration	Not Under Seal	N/A
1112-18	Exhibit 16 to Broome Declaration	Not Under Seal	N/A
1112-19	Exhibit 17 to Broome Declaration	Not Under Seal	N/A
1112-20	Exhibit 18 to Broome Declaration	Redacted	Google
1112-21	Exhibit 19 to Broome Declaration	Not Under Seal	N/A
1112-22	Exhibit 20 to Broome Declaration	Submitted In Camera	N/A
1112-23	Declaration of Abdelkarim Mardini In Support of Google LLC's Opposition to Plaintiffs' Motion for an Award of Attorneys' Fees, Costs, and Service Awards	Redacted	Google
1112-24	Exhibit 1 to Mardini Declaration	Not Under Seal	N/A
1112-25	Exhibit 2 to Mardini Declaration	Not Under Seal	N/A
1112-26	Exhibit 3 to Mardini Declaration	Not Under Seal	N/A
1112-27	Exhibit 4 to Mardini Declaration	Not Under Seal	N/A
1112-28	Exhibit 5 to Mardini Declaration	Not Under Seal	N/A
1112-29	Exhibit 6 to Mardini Declaration	Not Under Seal	N/A
1112-30	Exhibit 7 to Mardini Declaration	Not Under Seal	N/A
1112-31	Declaration of Benjamin Kornacki In Support of Google LLC's Opposition to Plaintiffs' Motion for an Award of Attorneys' Fees, Costs, and Service Awards	Redacted	Google
1112-32	Exhibit 1 to Kornacki Declaration	Not Under Seal	N/A
1112-33	Exhibit 2 to Kornacki Declaration	Not Under Seal	N/A
1112-34	Exhibit 3 to Kornacki Declaration	Not Under Seal	N/A
1112-35	Exhibit 4 to Kornacki Declaration	Not Under Seal	N/A
1112-36	Exhibit 5 to Kornacki Declaration	Not Under Seal	N/A

Dkt. No.	Document or Portion of Document Sought to Be Sealed	Sealed / Redacted / Not Under Seal / Submitted In Camera	Party Claiming Confidentiality
1112-37	Expert Declaration of Professor William B. Rubenstein (including Exhibits A & B)	Redacted	Google

DATED: June 7, 2024

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By /s/ Andrew H. Schapiro

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